

**McKool Smith**

 **PRYOR CASHMAN LLP**

September 5, 2024

By ECF

**MEMORANDUM ENDORSED**

The Honorable Gabriel W. Gorenstein  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 6B  
New York, New York 10007-1312

Re: Marc Restellini v. The Wildenstein Plattner Institute, Inc.  
20 Civ. 4388 (AT) (GWG)

Dear Judge Gorenstein:

This is a joint letter submitted on behalf of all parties to inform the Court of the parties' progress toward settlement and to request a further stay of all deadlines to permit the parties to complete the settlement process.

The parties have made substantial progress toward settlement. Currently, the parties are in the process of exchanging revised drafts of their settlement agreement and negotiating the details of certain terms in order to finalize same. The process has been moving forward productively, but the timeline has been extended due in part to holiday and vacation schedules (both European holiday schedules and U.S. counsel's vacation schedules in August).

The JAMS mediator who was instrumental in getting the parties to this point in the settlement process remains closely involved.

Accordingly, the parties jointly request that the Court continue the stay of all pending deadlines until October 18, 2024, to permit the parties to finalize and execute their settlement agreement. The Court previously granted a stay of all pending deadlines on June 13, 2024, July 1, 2024, and July 29, 2024, and adjourned a previously scheduled conference *sine die*. (ECF Nos. 177, 179, 181, 183.)

The Honorable Gabriel W. Gorenstein  
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Respectfully submitted,

PRYOR CASHMAN LLP

/s/

By:

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McKool Smith P.C.


/s/

By:

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Daniel W. Levy  
Eliza Beeney  
Attorneys for Plaintiff Marc Restellini

Granted. Report due October 18, 2024.

So Ordered.

  
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GABRIEL W. GORENSTEIN  
United States Magistrate Judge  
September 6, 2024